



Kenneth J. Redding
Chief Executive Officer

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February 13, 2006

FDIC - San Francisco Regional Office
Regional Director John F. Carter
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, California 94105

Re: Wal-Mart Bank Federal Deposit Insurance Application

Dear Director Carter:

I am writing in opposition to granting an FDIC charter to Wal-Mart. My bank has had 42 instances of debit card fraud perpetrated upon us within the past two years where Wal-Mart was the channel used to accomplish the fraud. We attempted to contact the Wal-Mart store manager where some of the fraudulent transactions were originated to see what, if anything could be done to prevent these fraudulent transactions. The store has been totally unresponsive and has refused to even discuss the issue with our personnel.

In addition to the debit card fraud exercised through the Wal-Mart channel, a number of our elderly customers have been preyed upon by scams requesting them to withdraw funds at our bank and bring them to Wal-Mart to be wired offshore. Wal-Mart has failed to meet even the most rudimentary tests required of banks to process financial transactions and has shown a callous disregard for the financial security of senior citizens by allowing them to wire their retirement savings to offshore scam artists. Wal-Mart should not be granted an FDIC charter and their business practices related to the perpetration of fraud on innocent victims should be investigated.

Wal-Mart has demonstrated that they are incapable of meeting the strict zero tolerance requirements of regulators as it relates to the USA Patriot Act and its Anti-Money Laundering provisions, the Bank Secrecy Act and its "Know Your Customer" provisions, and the requirements of the Office of Foreign Assets Control (OFAC). I suggest that Wal-Mart be required to demonstrate over a significant period of time, their ability to comply with the same regulatory requirements imposed on banks before any FDIC charter is considered.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken J. Redding", is written over a faint, circular embossed seal.

Kenneth J. Redding
President and Chief Executive Officer